

**RYAN J. MCLELLAN, OSB #023908**  
Email: [rmclellan@smithfreed.com](mailto:rmclellan@smithfreed.com)  
**JOSEPH A. ROHNER IV, OSB #064919**  
Email: [jrohner@smithfreed.com](mailto:jrohner@smithfreed.com)  
**SMITH FREED & EBERHARD PC**  
111 SW 5<sup>th</sup> Avenue, Suite 4300  
Portland, Oregon 97204  
Telephone: (503) 227-2424  
Facsimile: (503) 227-2535

**ROBERT P. CHARROW, admitted pro hac vice**  
Email: [charrowr@gtlaw.com](mailto:charrowr@gtlaw.com)  
**JOSEPH J. SUMMERILL IV, admitted pro hac vice**  
Email: [summerillj@gtlaw.com](mailto:summerillj@gtlaw.com)  
**GREENBERG TRAURIG, LLP**  
2101 L Street N.W., Suite 1000  
Washington, DC 20037  
Telephone: (202) 331-3100  
Facsimile: (202) 261-0110

**DAVID P. GOODWIN, admitted pro hac vice**  
Email: [goodwind@gtlaw.com](mailto:goodwind@gtlaw.com)  
**GREENBERG TRAURIG, LLP**  
3161 Michelson Drive, Suite 1000  
Irvine, CA 92612  
Telephone: (949) 732-6578  
Facsimile: (202) 261-0110

Attorneys for Intervenor-Defendant The GEO Group, Inc.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**STEPHEN RAHER,**

**CV 09-526-ST**

**Plaintiff,**

**v.**

**DECLARATION OF  
DAVID GOODWIN**

**FEDERAL BUREAU OF PRISONS,**

**Defendant,**

**THE GEO GROUP, INC.,**

**Defendant-Intervenor.**

**///**

**PAGE - 1 Declaration of David Goodwin**

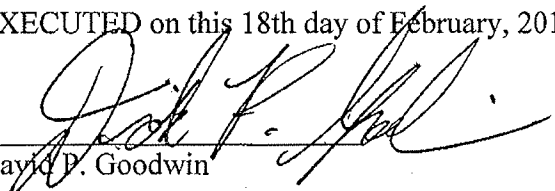
*Stephen Raher v. Federal Bureau of Prisons; CV 09-526-ST*

I, DAVID GOODWIN, declare as follows:

1. I am an associate with the law firm of Greenberg Traurig, LLP, admitted pro hac vice in the above-captioned matter, representing Defendant-Intervenor The GEO Group, Inc. ("GEO"). I submit the following declaration pursuant to Federal Rule of Civil Procedure 56(d).
2. In support of Plaintiff's Partial Motion for Summary Judgment, Plaintiff submitted the Declaration of Bryce Ward (Doc. No. 98), as an exhibit to Plaintiff's Supplemental Memorandum. Mr. Ward was never disclosed as an expert before.
3. If provided an opportunity by the Court, GEO would take targeted discovery to ascertain Mr. Ward's qualifications, along with the data, sources, bases and methodologies that he considered in forming his opinions.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this 18th day of February, 2011.

  
David P. Goodwin

### CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2011, I served a true and correct copy of the foregoing **DECLARATION OF DAVID GODWIN IN SUPPORT OF THE GEO GROUP, INC.'S REPLY TO PLAINTIFF'S SUPPLEMENTAL MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** on the date indicated below by:

|                                     |   |                                     |                                   |
|-------------------------------------|---|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | mail with first-class postage prepaid, deposited in the US mail at Portland, Oregon | <input type="checkbox"/>            | facsimile transmission            |
| <input type="checkbox"/>            | hand-delivery   | <input checked="" type="checkbox"/> | electronic filing notification to |
| <input type="checkbox"/>            | overnight delivery  |                                     | Kevin Danielson                   |

I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s)/individual(s) at the address(es) listed below:

**Stephen Raher**

P.O. Box 15189  
Portland, OR 97293-5189  
Phone: 503-235-8446  
*Pro Se Plaintiff*

**Kevin Danielson**

1000 SW Third Avenue, Suite 600  
Portland, OR 97204-2902  
Phone: 503-727-1025  
*Counsel for Defendant, Federal Bureau of Prisons*

SMITH FREED & EBERHARD P.C.

By: /s/ Joseph A. Rohner IV  
Ryan J. McLellan, OSB No. 023908  
Joseph A. Rohner IV, OSB #064919  
111 SW 5<sup>th</sup> Ave, Suite 4300  
Portland, OR 97204  
Telephone: (503) 227-2424  
Facsimile: (503) 227-2535  
Email: [rmclellan@smithfreed.com](mailto:rmclellan@smithfreed.com)  
[jrohner@smithfreed.com](mailto:jrohner@smithfreed.com)  
Of Attorneys for Intervenor  
Defendant, The GEO Group, Inc.